

FRANCE'S NF-ENVIRONNEMENT MARK

Introduction

France's national, voluntary ecolabeling program, the NF-Environnement Mark (Norme Française Environnement), has two functions: first, to fulfill the need for reliable information on the environmental attributes of a product, and second, to recognize and reward companies that take environmental attributes into consideration when making a product. The NF-Environnement Mark is a seal-of-approval program aimed at certifying products that have a reduced negative impact on the environment. Development of the label began in 1989. However, because of initial opposition from industry, the program was not fully operational until 1992. The main administrative body for the NF-Environnement Mark is the AFNOR (Association Française de Normalisation,) the standards institute of France.

As a relatively new program, there have been only a few product categories for which product criteria have been established. Currently, the NF-Environnement Mark can be awarded to products in six product categories. There are over 300 products that carry the NF-Environnement Mark with the majority of these in the paints and varnishes (160) and garbage bag categories (100), because these were two of the first categories established. The number of eco-certified products in the paints and varnishes category is expected to drop once criteria for this category are revised.

Despite being a relatively new program, the awareness of ecolabeling in France is growing. In 1996, AFNOR asked CREDOC, one of France's largest national polling agencies, to survey 2,000 French households (representative of the population in France). The purpose of the survey was to characterize consumers' opinions on ecolabeling and environmental products. According to the survey, 63 percent of the respondents said that there is a lack of quantitative and qualitative information about "green" products and 92 percent of those surveyed said that they preferred products with less packaging. Of those surveyed, 54 percent said that they would be willing to pay up to 10 percent more for ecological products. The program hopes that "consumer leaders," those who are aware of the NF-Environnement Mark and ecolabeling in general, will spread the word to others about ecolabeled products (Bøeglin, 1997).

Recent Developments

On June 24, 1992, work on NF-Environnement Mark was suspended by the AFNOR pending a re-evaluation of its methodology. Originally, the NF-Environnement Mark planned to use a multi-criteria matrix similar to Blue Angel and the EU Eco-label. Products were assessed using a systematic life-cycle assessment (LCA), which looked at products from "cradle-to-grave" (i.e., amount and types of raw materials used, production, transportation, effects of consumption, and disposal), to evaluate their overall environmental impacts at each of these stages. However, because of the time-consuming nature and costs associated with LCA, AFNOR decided upon a modified life-cycle analysis approach, called the "New Simplified Procedure," to develop criteria and to evaluate products to receive the label (Bøeglin, 1997). This new procedure uses a semi-

qualitative life-cycle assessment for the product, and identifies the “key stages” in the product’s life cycle that have the most significant environmental impacts. This new process is iterative based on both qualitative and quantitative data. The “New Simplified Procedure” was adopted to make the NF-Environnement Mark less expensive and more available to small and medium-sized businesses and industries.

NF-Environnement Mark plans to coordinate its efforts with other European programs, “both through the process of harmonization of standards and through its participation in European reciprocal recognition agreements” (General Rules, 1992). As a result of this coordination of efforts, the product criteria for paints and varnishes were approved on June 3, 1992, based on a study originally conducted for the EU Eco-label. NF-Environnement Mark is currently not a member of the Global Ecolabelling Network (GEN) for financial and logistical reasons. However, AFNOR is considering becoming a member soon to take advantage of the information exchanged through GEN membership. AFNOR participates regularly in meetings and exchanges with other ecolabeling programs on trade issues, standards development, and program implementation.

Program Summary

Four groups are involved in the NF-Environnement Mark program: the NF Environmental Label Committee (Comité de la Marque), composed of 18 representatives from various stakeholders, including industry, manufacturers, wholesalers, consumer and environmental protection associations, and the French Ministry for the Environment; the ADEME (French Energy Management and Environment Agency); the AFNOR (the French Institute for Standards); and other stakeholders particularly interested in the product category.

The NF-Environnement Mark can be awarded to consumer goods and intermediate products. Theoretically, anyone can propose new product categories. In practice, however, industry representatives or environmental authorities such as ADEME, typically propose products that they feel may be suitable for the ecolabel. These proposals are collected by AFNOR and submitted to the Label Committee, who then chooses the product categories for the ecolabel. Based on environmental evaluations using the “New Simplified Approach,” the Label Committee, decides if the overall product group(s) in which the proposed product(s) belong, would be good candidates for the NF-Environnement Mark.

Draft product criteria, or as they are known, the “Règlement Technique” (Technical Rule), include all the specific guidelines (environmental, product performance, advertising, etc.) which manufacturers must meet to be awarded the NF-Environnement Mark. Once finalized by the Committee and approved by the General Director of AFNOR, the criteria are published in the *Journal Officiel* (France’s equivalent of the United States Federal Register), and applications for the NF-Environnement Mark are accepted. Product criteria are usually re-evaluated every three

years, but may be evaluated sooner if there are new breakthroughs in technology relating to the product category. Only the garbage bag and paints and varnishes product categories have reached their three-year revision periods -- the other four product categories have been so recently established that they still have another one to two years before their product criteria are re-considered.

Applications for the NF-Environnement Mark are sent to the General Director of AFNOR. The manufacturer must pay a flat-rate registration fee of 420 Francs (approximately \$2,500 US) to cover the costs of processing the application. In addition, the manufacturer must repay the costs of verifying that the product conforms to the Technical Rules, as well as pay a site visit fee, an administration fee, and compliance test fees. In addition, an annual royalty payment (0.1 percent of the product sales) is payable for the right to use the NF-Environnement logo. If a manufacturer is found to be mis-using the NF-Environnement Mark, AFNOR may apply sanctions on the product and/or may withdraw the manufacturer's right to use the ecolabel.

Program Methodology

Once proposals for products categories are made and collected by AFNOR, environmental evaluations based on the "New Simplified Approach" are made by the Label Committee, who decides if the overall product group(s) in which the proposed product(s) belong, would be good candidates for the NF-Environnement Mark. Though a full LCA is not conducted, information from other programs' LCAs, where available, and information from producers are used in evaluating a product's suitability for the label. In addition, the program follows SETAC guidelines in its evaluations.

When developing product-specific criteria, products are assessed to determine their environmental impacts, based on multiple ecological factors, (e.g., the impact of the products' wastes on the environment -- to air, water, and soil). Once identified, these impacts are quantified for setting threshold levels (e.g., limits on toxicity of chemicals, VOC content, hazardous materials content, etc.). Products are also assessed on the following: energy use, raw material extraction and use, emissions during production, product uses, potential for recycling, disposal, product ingredients, type of wastes generated, environmental and health and safety hazards, and durability as well as real duration of use. Additionally, the NF-Environnement Mark conducts a generic environmental impact analysis when developing product criteria.

The NF-Environnement scheme invites stakeholders from various organizations to participate in all stages of criteria development. For example, a working group composed of representatives from industry, retailers, environment, and consumer NGOs, AFNOR, and if needed, experts from the concerned product sector, are involved in drafting the Technical Rule. Foreign companies are also invited to participate in the draft criteria development but must first express their interest in participating in the process. They may then be given the option of participating in the criteria development process and will at least be told what the draft criteria are and be invited to provide their comments. For example, several foreign garbage bag and vacuum cleaner manufacturers

were involved in the criteria development for these categories.

Other information

Although possession of the NF-Environnement Mark is not an official requirement for procurement, some distributors of paints and varnishes, and/or retail stores, require that their suppliers provide at least one line of product that carries the NF-Environnement Mark. Additionally, certain municipalities and local authorities have specified that the garbage bags they purchase must bear the NF-Environnement Mark.

Because the NF-Environnement Mark is a relatively new program, there have been no studies to determine overall trade and market effects. The NF-Environnement Mark has not yet developed product criteria for products imported from developing countries. The only foreign products that have been awarded the French ecolabel have been products manufactured by European companies. Because the NF-Environnement Mark is a relatively new program, it has not yet gained international recognition, and information about the program has not been available internationally -- in fact it is still in the early stages of recognition domestically.

References

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Product Categories (number of awarded products in parentheses)

Final Categories

- Paints and varnishes (160)
- Garbage bags (100)
- Carpet glues
- Vacuum cleaners
- Soap-saving washing machine balls
- Garbage compressors

Categories Under Review

- Furniture
- Scouring solvents/powders
- Containers
- Photography developing equipment

Categories Under Consideration

- Pharmaceuticals
- Agro-foods
- Services
- Automotive sectors

